

City of Portland, Oregon **Bureau of Development Services**

Land Use Services

FROM CONCEPT TO CONSTRUCTION

Ted Wheeler, Mayor Rebecca Esau, Director Phone: (503) 823-7300 Fax: (503) 823-5630 TTY: (503) 823-6868 www.portlandoregon.gov/bds

Date: September 9, 2019 To: Interested Person

Megan Sita Walker, Land Use Services From:

503-823-7294 / MeganSita.Walker@portlandoregon.gov

NOTICE OF A TYPE II DECISION ON A PROPOSAL IN YOUR NEIGHBORHOOD

The Bureau of Development Services has approved a proposal in your neighborhood. The mailed copy of this document is only a summary of the decision.

The reasons for the decision are included in the version located on the BDS website http://www.portlandonline.com/bds/index.cfm?c=46429. Click on the District Coalition then scroll to the relevant Neighborhood, and case number. If you disagree with the decision, you can appeal. Information on how to do so is included at the end of this decision.

CASE FILE NUMBER: LU 19-147904 HR - WINDOW REPLACMENT & ALTERATIONS

GENERAL INFORMATION

Applicant: Julie Staley | Staley Enterprises LLC

23950 SW Mountain Road | West Linn, OR 97068

(503) 928-2375

Owner: Staley Enterprises LLC

23950 SW Mountain Rd West Linn, OR 97068

Site Address: 2836 NE 7TH AVE

Legal Description: BLOCK 116 LOT 20, IRVINGTON

Tax Account No.: R420425450 State ID No.: 1N1E26BC 11400

Quarter Section: 2731

Neighborhood: Irvington, contact Dean Gisvold at 503-284-3885.

Business District: Soul District Business Association, contact at info@nnebaportland.org **District Coalition:** Northeast Coalition of Neighborhoods, contact Laura Becker at 503-

388-6088.

Plan District:

Other Designations: Contributing Resource in the Irvington Historic District

R5 – Residential 5,000 with Historic Resource Protection Overlay Zoning:

Case Type: HR - Historic Resource Review

Procedure: Type II, an administrative decision with appeal to the Landmarks

Commission.

Proposal:

The applicant is seeking Historic Resource Review approval to replace all windows on all facades of a contributing resource in the Irvington Historic District. All original leaded glass and wood casement and wood double-hung windows were removed and replaced with vinyl windows without the benefit of Historic Resource Review (CC 17-280225) by a previous owner. The proposed replacement windows are all-wood casements with simulated divided lites, and all-wood double-hung windows to be installed within the existing/original openings. The proposal also includes alterations to repair previously altered columns and trim detailing on the front porch, and alterations to an existing enclosed area at the northeast corner of the resource. The alterations at the north east corner of the resource include replacing a previously removed door with an all-wood three-lite door facing NE Stanton, installing an electrical meter on the rear (east) elevation, and adding an all-wood door, all-wood trim and a small area of lap on the rear elevation of a small porch previously enclosed with paneling.

Historic Resource Review is required for non-exempt exterior alterations within a Historic District.

Relevant Approval Criteria:

In order to be approved, this proposal must comply with the approval criteria of Title 33, Portland Zoning Code. The relevant criteria are:

■ 33.846.060.G Other approval criteria

ANALYSIS

Site and Vicinity: The subject property is located on a 5,000 square foot corner lot with the primary entry facing west on NE 7th Avenue and a secondary entry facing north on NE Stanton Street. The single-story brick resource was constructed in 1922 in a Georgian Revival style. The resource fronts onto NE 7th which is the western boundary of the Irvington Historic District and is located on a block with many other contributing resources, primarily single dwellings. The resource was previously altered at some time in the past to enclose a central entry porch facing NE Stanton and to enclose a small rear porch and add a door at the north-east (rear) corner of the north facade.

Irvington Historic District Platted in the late Nineteenth Century as the first addition to Portland that employed restrictive covenants, the Irvington area developed intensely with a mix of middle class housing types and sizes during the first two decades of the Twentieth Century. The contributing resources in Irvington range in design character from expressions of the late Victorian Era styles, especially Queen Anne, through the many Period Revival modes of the early decades of the Twentieth Century, to a few early modernist examples. There is also a wide diversity in the sizes of lots and houses. In terms of the streetscape, the numbered north-south avenues in Irvington vary dramatically in width, and they mostly form rather long block faces which the houses generally face. The named east-west street block faces are more consistent in length, almost all being traditional 200' Portland blocks. All are lined with mature street trees. These patterns help to lend the neighborhood the distinctive and homogeneous historic character.

Zoning: The single-dwelling zones, including <u>Residential 5,000 (R5)</u>, are intended to preserve land for housing and to provide housing opportunities for individual households. The zones implement the comprehensive plan policies and designations for single-dwelling housing.

The <u>Historic Resource Protection</u> overlay is comprised of Historic and Conservation Districts, as well as Historic and Conservation Landmarks and protects certain historic resources in the region and preserves significant parts of the region's heritage. The regulations implement Portland's Comprehensive Plan policies that address historic preservation. These policies recognize the role historic resources have in promoting the education and enjoyment of those living in and visiting the region. The regulations foster pride among the region's citizens in their

city and its heritage. Historic preservation beautifies the city, promotes the city's economic health, and helps to preserve and enhance the value of historic properties.

Land Use History: City records indicate there are no prior land use reviews for this site.

Agency Review: A "Notice of Proposal in Your Neighborhood" was mailed **May 3, 2019**. The following Bureaus have responded with no issues or concerns:

- Fire Bureau (See Exhibit E-1)
- Life Safety Division of BDS (See Exhibit E-2)

Neighborhood Review: A Notice of Proposal in Your Neighborhood was mailed on May 3, 2019. A total of two written responses have been received from either the Neighborhood Association or notified property owners in response to the proposal.

- 1. Joseph Albert, on May 8, 2019, wrote in with concern regarding the materially of previously proposed aluminum-clad wood windows and the potential detailing concerns with some divided lite windows. See Exhibit F-1 for additional information.
- 2. Dean Gisvold, Chair of the Irvington Community Association Land Use Committee, on May 20, 2019, wrote with concerns regarding the lack of clarity in the application, and noted a need for better documentation of the proposal with drawings/ photos and noting desire for wood windows that replicate the originals if the originals do not remain/ cannot be repaired. The ICA also noted concerns with previously proposed stucco on the small existing/ previously enclosed rear porch. See Exhibit F-2 for additional information.

Staff Response: Staff encouraged the owner to more clearly communicate the proposal by providing an inventory of all previously altered windows (currently vinyl windows) that are proposed to be replaced with either all-wood divided lite casements or all-wood double-hung windows depending on previous/ historic condition. The inventory provided further documented the proposed changes to the existing porch columns and detailing that are proposed to be restored to the previous/ historic condition with samples of proposed trim to match previous detailing. Lastly, staff worked with the applicant to address concerns with the location of the electrical meter on the street facing façade and the applicant/ owner has revised the drawings to show the meter on the rear (east) façade, the reintroduction of a door facing NE Stanton, and limited field of lap siding to cover the small previously paneled enclosed porch on the rear elevation. In working with the applicant/owner, the proposal has been more clearly communicated and has undergone revisions in order to address compatibility concerns. Staff has also added Conditions of Approval to ensure materials and detailing are compatible with the resource and the district. See findings for additional information.

ZONING CODE APPROVAL CRITERIA

Chapter 33.846.060 - Historic Resource Review

Purpose of Historic Resource Review

Historic Resource Review ensures the conservation and enhancement of the special characteristics of historic resources.

Historic Resource Review Approval Criteria

Requests for Historic Resource Review will be approved if the review body finds the applicant has shown that all of the approval criteria have been met.

Findings: The site is within the Irvington Historic District and the proposal is for non-exempt treatment. Therefore Historic Resource Review approval is required. The approval criteria are those listed in *33.846.060 G – Other Approval Criteria*.

Staff has considered all quidelines and addressed only those applicable to this proposal.

33.846.060 G - Other Approval Criteria

- **1. Historic character.** The historic character of the property will be retained and preserved. Removal of historic materials or alteration of features and spaces that contribute to the property's historic significance will be avoided.
- **2. Record of its time.** The historic resource will remain a physical record of its time, place, and use. Changes that create a false sense of historic development, such as adding conjectural features or architectural elements from other buildings will be avoided.
- **3. Historic changes.** Most properties change over time. Those changes that have acquired historic significance will be preserved.
- **4. Historic features.** Generally, deteriorated historic features will be repaired rather than replaced. Where the severity of deterioration requires replacement, the new feature will match the old in design, color, texture, and other visual qualities and, where practical, in materials. Replacement of missing features must be substantiated by documentary, physical, or pictorial evidence.
- **7. Differentiate new from old.** New additions, exterior alterations, or related new construction will not destroy historic materials that characterize a property. New work will be differentiated from the old.
- **9. Preserve the form and integrity of historic resources.** New additions and adjacent or related new construction will be undertaken in such a manner that if removed in the future, the essential form and integrity of the historic resource and its environment would be unimpaired.
 - **Findings for 1, 2, 3, 4, 7, and 9:** All original leaded glass and wood framed casement windows and all wood double-hung windows were removed and replaced with vinyl windows without the benefit of Historic Resource Review by a previous owner (CC 17-280225). The current proposal includes the replacement of all vinyl windows with all-wood casements with divided lites, and all-wood double-hung windows to be installed within the existing/original openings to better match the original windows already removed in terms of scale, detailing, and material quality. To ensure that the proposed divided lites are consistent with the visual qualities of the previously removed casements, staff has added Condition of Approval "D" that the proposed divided lites shall either be true divided lites or simulated divided lites with interior and exterior muntins and a spacer bar between the panes of glass.

As a whole, the proposed alterations will not alter any historic features or changes that have acquired significance and proposed work will be differentiated through the use of contemporary construction methods. Staff finds that the proposal will not damage historic materials and will work to match the character of the resource.

With a Condition of Approval that the proposed divided lites shall either be true divided lites or simulated divided lites with interior and exterior muntins and a spacer bar between the panes of glass, these criteria are met.

5. Historic materials. Historic materials will be protected. Chemical or physical treatments, such as sandblasting, that cause damage to historic materials will not be used.

Findings: No chemical treatments are proposed. *This criterion is not applicable.*

6. Archaeological resources. Significant archaeological resources affected by a proposal will be protected and preserved to the extent practical. When such resources are disturbed, mitigation measures will be undertaken.

Findings: No ground surfaces will be disturbed. *This criterion is not applicable.*

8. Architectural compatibility. New additions, exterior alterations, or related new construction will be compatible with the resource's massing, size, scale, and architectural features. When retrofitting buildings or sites to improve accessibility for persons with

disabilities, design solutions will not compromise the architectural integrity of the historic resource

10. Hierarchy of compatibility. Exterior alterations and additions will be designed to be compatible primarily with the original resource, secondarily with adjacent properties, and finally, if located within a Historic or Conservation District, with the rest of the district. Where practical, compatibility will be pursued on all three levels.

Findings for 8 and 10: As described above, the intent of the current proposal includes the replacement of all previously installed/ non-compliant vinyl windows with all-wood casements with divided lites, and all-wood double-hung windows to be installed within the existing/original openings to be more compatible with the subject resource, adjacent resources, and the district as a whole by referencing scale, profile, detailing and material. To ensure that the proposed divided lites are architecturally compatible with the resource, staff has added Condition of Approval "D" that the proposed divided lites shall either be true divided lites or simulated divided lites with interior and exterior muntins and a spacer bar between the panes of glass.

The proposal also includes alterations at the north east corner of the resource to include: replacing a previously removed door with an all-wood three-lite door on the north elevation facing NE Stanton, installing an electrical meter on the rear (east) elevation, and adding an all-wood door, all-wood trim and a small area of lap siding on the rear (east) elevation of a small porch previously enclosed with paneling. From photos of the house before the alterations were made, it appears that this previously altered/enclosed porch was clad in what appears to be a light-colored paneling. The installation of the small field of lap siding is a minor element that is more consistent with the scale and detailing seen elsewhere on the resource. Also, the introduction of the door on the rear (east) elevation further limits the field of cladding and minimizes visibility. To ensure that the small section of lap siding on the rear elevation is compatible with the resource, staff has added Condition of Approval "E" that the proposed lap siding shall be wood lap siding with a maximum of a 4-inch reveal.

Lastly, the proposal includes reversing pervious alterations to the front porch columns and column capitals completed without the benefit of Historic Resource Review to include replacing the rear columns and replacing removed trim. The applicant/owner proposes all-wood trim consistent with the profile, size, and material of the previously removed elements based on historic photos of porch as well as the ghostmarks of trim that remain visible. To ensure that the profile of the proposed trim matches the profiles shown and that the alterations to the front porch columns are compatible with the resource, staff has added Condition of Approval "F" that the capitals on the front porch columns shall match the detailing shown in the historic photograph (Exhibit A-2, sheet 'C1a') by using the trim shown on Exhibit C-29.

The alterations proposed respect the integrity of the previously altered resource. The applicant/ owner has been responsive to concerns from staff regarding concerns with detailing, and the location of the electrical meter (previously proposed on a street facing facade) and has made clarifications and changes to ensure the compatibility of the proposal with the resource. The proposed alterations will respect the character of the resource by retaining existing character defining details and proposing new elements that are architecturally compatible, ensuring that the architectural integrity of the resource will not be compromised.

With a Condition of Approval that the proposed divided lites shall either be true divided lites or simulated divided lites with interior and exterior muntins and a spacer bar between the panes of glass;

With a Condition of Approval that the proposed lap siding shall be wood lap siding with a maximum of a 4-inch reveal; and

With a Condition of Approval that the capitals on the front porch columns shall match the detailing shown in the historic photograph (Exhibit A-2, sheet 'C1a') by using the trim shown on Exhibit C-29, these criteria are met.

DEVELOPMENT STANDARDS

Unless specifically required in the approval criteria listed above, this proposal does not have to meet the development standards in order to be approved during this review process. The plans submitted for a building or zoning permit must demonstrate that all requirements of Title 11 can be met, and that all development standards of Title 33 can be met or have received an Adjustment or Modification via a land use review, prior to the approval of a building or zoning permit.

CONCLUSIONS

The replacement of the existing non-historic vinyl windows and the restoration of previously removed elements on the front porch and side/ rear door is intended to correct a violation for the removal of original casement and double-hung windows and alterations done without the benefit of Historic Resource Review. The proposed all-wood simulated divided lite casements and all-wood double hung windows to be set within existing/ original openings better match the original windows that were removed and will not impact the significance of the resource. The new windows, the restoration of the detailing on the front porch columns, and the small non-original rear/ side porch enclosure are compatible with the resource and the district as a whole as they better relate to the previously removed original windows in terms of scale, profile, and detailing. The purpose of the Historic Resource Review process is to ensure that additions, new construction, and exterior alterations to historic resources do not compromise their ability to convey historic significance. With conditions of approval, the proposal meets the applicable Historic Resource Review criteria and therefore warrants approval.

ADMINISTRATIVE DECISION

Approval of exterior alterations to a contributing resource in the Irvington Historic District to include the replacement of existing non-original/non-compliant vinyl windows on all facades with all-wood simulated divided lite casements and all-wood double-hung windows within existing/original openings to better match previously removed historic windows. The proposal also includes alterations to repair previously altered columns and trim detailing on the front porch, and alterations to an existing enclosed area at the northeast corner of the resource to include replacing a previously removed door with an all-wood three-lite door facing NE Stanton, installing an electrical meter on the rear (east) elevation, and adding an all-wood door, all-wood trim and a small area of lap on the rear elevation of a small porch previously enclosed with paneling.

Approved with conditions per Exhibits C-1 through C-30, signed and dated September 4, 2019, subject to the following conditions:

- A. As part of the building permit application submittal, the following development-related conditions (B through F) must be noted on each of the 4 required site plans or included as a sheet in the numbered set of plans. The sheet on which this information appears must be labeled "ZONING COMPLIANCE PAGE Case File LU 19-147904 HR." All requirements must be graphically represented on the site plan, landscape, or other required plan and must be labeled "REQUIRED."
- B. At the time of building permit submittal, a signed Certificate of Compliance form (https://www.portlandoregon.gov/bds/article/623658) must be submitted to ensure the permit plans comply with the Design/Historic Resource Review decision and approved exhibits.
- C. No field changes allowed.

- D. The proposed divided lites shall either be true divided lites or simulated divided lites with interior and exterior muntins and a spacer bar between the panes of glass.
- E. The proposed lap siding shall be wood lap siding with a maximum of a 4-inch reveal.
- F. The capitals on the front porch columns shall match the detailing shown in the historic photograph (Exhibit A-2, sheet 'C1a') by using the trim shown on Exhibit C-29.

Staff Planner: Megan Sita Walker

Decision rendered by: on September 4, 2019

By authority of the Director of the Bureau of Development Services

Decision mailed: September 9, 2019

About this Decision. This land use decision is **not a permit** for development. Permits may be required prior to any work. Contact the Development Services Center at 503-823-7310 for information about permits.

Procedural Information. The application for this land use review was submitted on April 12, 2019, and was determined to be complete on April 26, 2019.

Zoning Code Section 33.700.080 states that Land Use Review applications are reviewed under the regulations in effect at the time the application was submitted, provided that the application is complete at the time of submittal, or complete within 180 days. Therefore this application was reviewed against the Zoning Code in effect on April 12, 2019.

ORS 227.178 states the City must issue a final decision on Land Use Review applications within 120-days of the application being deemed complete. The 120-day review period may be waived or extended at the request of the applicant. In this case, the applicant requested that the 120-day review period be extended (See Exhibits A-5, A-6, and A-7). Unless further extended by the applicant, **the 120 days will expire on: November 2, 2019.**

Some of the information contained in this report was provided by the applicant.

As required by Section 33.800.060 of the Portland Zoning Code, the burden of proof is on the applicant to show that the approval criteria are met. The Bureau of Development Services has independently reviewed the information submitted by the applicant and has included this information only where the Bureau of Development Services has determined the information satisfactorily demonstrates compliance with the applicable approval criteria. This report is the decision of the Bureau of Development Services with input from other City and public agencies.

Conditions of Approval. If approved, this project may be subject to a number of specific conditions, listed above. Compliance with the applicable conditions of approval must be documented in all related permit applications. Plans and drawings submitted during the permitting process must illustrate how applicable conditions of approval are met. Any project elements that are specifically required by conditions of approval must be shown on the plans, and labeled as such.

These conditions of approval run with the land, unless modified by future land use reviews. As used in the conditions, the term "applicant" includes the applicant for this land use review, any person undertaking development pursuant to this land use review, the proprietor of the use or development approved by this land use review, and the current owner and future owners of the property subject to this land use review.

Appealing this decision. This decision may be appealed to the Landmarks Commission, which will hold a public hearing. Appeals must be filed **by 4:30 PM on September 23, 2019** at 1900 SW Fourth Ave. Appeals can be filed at the 5th floor reception desk of 1900 SW 4th Avenue Monday through Friday between 8:00 am and 4:30 pm. **An appeal fee of \$250 will be charged**. The appeal fee will be refunded if the appellant prevails. There is no fee for ONI recognized organizations appealing a land use decision for property within the organization's boundaries. The vote to appeal must be in accordance with the organization's bylaws.

Assistance in filing the appeal and information on fee waivers is available from BDS in the Development Services Center. Please see the appeal form for additional information.

The file and all evidence on this case are available for your review by appointment only. Please call the Request Line at our office, 1900 SW Fourth Avenue, Suite 5000, phone 503-823-7617, to schedule an appointment. I can provide some information over the phone. Copies of all information in the file can be obtained for a fee equal to the cost of services. Additional information about the City of Portland, city bureaus, and a digital copy of the Portland Zoning Code is available on the internet at www.portlandonline.com.

Attending the hearing. If this decision is appealed, a hearing will be scheduled, and you will be notified of the date and time of the hearing. The decision of the Landmarks Commission is final; any further appeal must be made to the Oregon Land Use Board of Appeals (LUBA) within 21 days of the date of mailing the decision, pursuant to ORS 197.620 and 197.830. Contact LUBA at 775 Summer St NE, Suite 330, Salem, Oregon 97301-1283, or phone 1-503-373-1265 for further information.

Failure to raise an issue by the close of the record at or following the final hearing on this case, in person or by letter, may preclude an appeal to the Land Use Board of Appeals (LUBA) on that issue. Also, if you do not raise an issue with enough specificity to give the Landmarks Commission an opportunity to respond to it, that also may preclude an appeal to LUBA on that issue.

Recording the final decision.

If this Land Use Review is approved the final decision will be recorded with the Multnomah County Recorder.

• *Unless appealed*, the final decision will be recorded after **September 24, 2019** by the Bureau of Development Services.

The applicant, builder, or a representative does not need to record the final decision with the Multnomah County Recorder.

For further information on your recording documents please call the Bureau of Development Services Land Use Services Division at 503-823-0625.

Expiration of this approval. An approval expires three years from the date the final decision is rendered unless a building permit has been issued, or the approved activity has begun.

Where a site has received approval for multiple developments, and a building permit is not issued for all of the approved development within three years of the date of the final decision, a new land use review will be required before a permit will be issued for the remaining development, subject to the Zoning Code in effect at that time.

Applying for your permits. A building permit, occupancy permit, or development permit may be required before carrying out an approved project. At the time they apply for a permit, permittees must demonstrate compliance with:

- All conditions imposed herein;
- All applicable development standards, unless specifically exempted as part of this land use review;
- All requirements of the building code; and
- All provisions of the Municipal Code of the City of Portland, and all other applicable ordinances, provisions and regulations of the City.

EXHIBITS

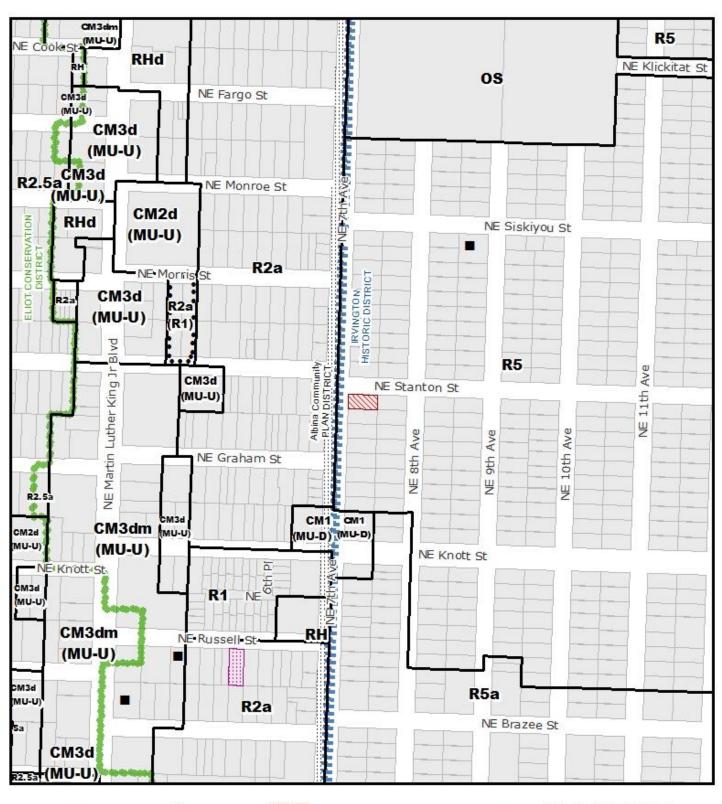
NOT ATTACHED UNLESS INDICATED

- A. Applicant's Statement
 - 1. Original Narrative & Drawing Packet
 - 2. Inventory of Window, Door, and Column Alteration Locations
 - 3. Window Specifications & Schedule
 - 4. Samples of Trim
 - 5. Extension to the 120-Day Review period

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- 6. Extension to the 120-Day Review period
- 7. Extension to the 120-Day Review period
- B. Zoning Map (attached)
- C. Plans/Drawings:
 - 1. Site Plan (attached)
 - 2. Window 2 Enlarged Elevation
 - 3. Window 3 Enlarged Elevation
 - 4. Window 4 Enlarged Elevation
 - 5. Window 5 Enlarged Elevation
 - 6. Window 6 Enlarged Elevation
 - 7. Window 7 Enlarged Elevation
 - 8. Window 8 Enlarged Elevation
 - 9. Window 10 Enlarged Elevation
 - 10. Window 9 Enlarged Elevation
 - 11. Window 11 Enlarged Elevation
 - 12. Window 12 Enlarged Elevation
 - 13. Window 13 Enlarged Elevation
 - 14. Window 14 Enlarged Elevation
 - 15. Window 15 Enlarged Elevation
 - 16. Window 16 Enlarged Elevation
 - 17. Window 17 Enlarged Elevation
 - 18. Window 18 Enlarged Elevation
 - 19. Door 1 Specification
 - 20. Door 1 Enlarged North Elevation
 - 21. Door 2 Enlarged East Elevation w/ Electrical Box and Lap Siding
 - 22. Columns 1 Enlarged West Elevation
 - 23. Columns 1 Enlarged Plan
 - 24. Section Detail Casement Jamb
 - 25. Section Detail Casement Jamb
 - 26. Section Detail Sill Nose
 - 27. Section Detail Double-Hung Jamb
 - 28. Section Detail Double-Hung Jamb
 - 29. Trim Decorative
 - 30. Trim Backband
- D. Notification information:
 - 1. Mailing list
 - 2. Mailed notice
- E. Agency Responses:
 - 1. Fire
 - 2. Life Safety Division of BDS
- F. Correspondence:
 - 1. Joseph Albert, on May 8, 2019, wrote in with concerns about the proposal.
 - 2. Dean Gisvold, Chair of the Irvington Community Association Land Use Committee, on May 20, 2019, wrote in with concerns about the proposal
- G. Other:
 - 1. Original LU Application
 - 2. Street View Photos of Previous Condition
 - 3. Code Compliance Photos
 - 4. Email correspondence between staff and the applicant

The Bureau of Development Services is committed to providing equal access to information and hearings. Please notify us no less than five business days prior to the event if you need special accommodations. Call 503-823-7300 (TTY 503-823-6868).





Site

Also Owned Parcels

Historic Landmark

File No. LU 19-147904 HR

1/4 Section 2731

Scale 1 inch = 300 feet

State ID 1N1E26BC 11400

Exhibit B Apr 16, 2019

Approved City of Postland - Bureau of Development Services Planner * This approval applies only to the reviews requested and is subject to all conditions of approval. Additional zoning requirements may apply. * APPROVED PER CONDITIONS B-F W15 WIA 2/26/19 Scale 1/8"= 1 FOOT W13 W5 · W12 WII LOCATION OF ALTERATION W= WINDON LAW LAWN D= DOOR C = COLUMN

EXH C-| LU 19-147904 HR